

REMARKS

In the Office Action mailed September 30, 2004, the Examiner noted that claims 1-11 were pending, and rejected claims 1-11. Claims 1, 3 and 9-11 have been amended, new claims 12 and 13 have been added and, thus, in view of the forgoing claims 1-13 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

The Examiner has also objected to the specification which has been amended in consideration of the Examiner's comments. Withdrawal of the objection is requested.

On page 3 of the Office Action, the Examiner rejected claims 1, 2 and 9-11 under 35 U.S.C. § 102 as anticipated by DeRose. Page 6 of the Office Action rejects claims 3, 4 and 6-8 under 35 U.S.C. § 103 over a combination of DeRose and Ardoin. Page 9 of the Office Action rejects claim 5 under 35 U.S.C. § 103 over DeRose and Ardoin with Alam.

DeRose discusses a system that allows the addition of an element to a tree type data structure. As described in col. 10, line 35+ with respect to flowchart of figure 8, and particularity at col. 11, line 25+, DeRose adds the new element so that the size of the tree and the number of branches increases. This results in a corresponding increase in the amount of memory required to store the tree when the increase is the size of the new element in the element directory 91 (see figure 6).

Alam discusses converting the image data format of a document from one format to another.

Ardoin discusses joining tree structures where the total number of tree nodes/branches, etc. remain the same

In contrast, the present invention (see, for example claim 1) is designed to compress a structured document to reduce the amount of memory required for the structure with a new element added (see application page 17, lines 3-7). The present invention does this by "joining" contents of two records, "generating a new record" that contains the two records, and "replacing" the two records with the new record, thereby "decreasing" the number of hierarchical elements of the structured document. Claims 3, 9, 10 and 11 also emphasize the decreased number of hierarchical elements.

It is submitted that the invention of independent claims distinguishes over the prior art and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 4 emphasizes that side by side records are combined when they have the same element name in two levels. It is submitted that the dependent claims are independently patentable over the prior art.

New claims 12 and 13 emphasize that a structured document is compressed by combining hierarchical elements responsive to common features of parts of the hierarchy. Nothing in the prior art teaches or suggests such. It is submitted that these new claims, which are different and not narrower than prior filed claims distinguishes over the prior art.

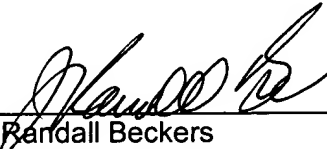
It is submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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